

# Exhibit D-2

## David Carey

Date	Description of Services	Time
4/5/2018	Conference call with ACLU and Lambda personnel regarding case status, latest client correspondence, and next steps.	1.1
4/13/2018	Review previous research regarding designation of related cases, and correspond with F. Levenson.	0.2
6/21/2018	Call with litigation team regarding initial disclosures.	1.2
6/28/2018	Call with co-counsel regarding case strategy and next steps.	0.9
7/7/2018	Correspond with F. Levenson and other co-counsel regarding case strategy and next steps.	0.4
7/9/2018	Conference call with co-counsel regarding next steps and motion to dismiss.	1.0
7/10/2018	Discuss MTD w/ ME	0.1
7/16/2018	Review draft opposition to motion to dismiss.	0.5
7/16/2018	Review and revise draft interrogatories and requests for production.	1.2
7/17/2018	Correspond with co-counsel regarding case strategy.	0.5
7/18/2018	Pretrial conference call with Court and all counsel.	1.2
7/18/2018	Call with co-counsel regarding strategy pertaining to motion to dismiss.	1.2
7/20/2018	Review and analyze motion for stay of discovery and emergency motion for interim stay, outline response arguments for M. Eble, and send update to co-counsel.	2.1
7/22/2018	Review and revise draft opposition to motion to dismiss.	2.4
7/24/2018	Review and revise draft opposition to motion for interim stay.	1.8
7/25/2018	Revise draft opposition to motion for interim stay of discovery.	2.8
7/26/2018	Correspondence and discussion with co-counsel regarding opposition to motion to dismiss and opposition to motion for interim stay.	2.3
8/3/2018	Review and revise draft opposition to motion to stay discovery.	3.5
8/6/2018	Incorporate co-counsel's edits into draft opposition to motion for stay of discovery, and circulate new draft to co-counsel.	1.2
10/11/2018	Conference call with co-counsel regarding discovery strategy.	0.4

11/13/2018	Correspond with S. Becker and F. Levenson regarding protective order and discovery strategy.	0.5
11/14/2018	Draft proposed protective order.	2.5
11/16/2018	Revise draft proposed protective order, and send to opposing counsel.	1.0
11/21/2018	Review draft protective order and circulate proposed revisions to co-counsel.	0.8
12/3/2018	Finalize protective order, obtain consent of opposing counsel, and send for filing.	1.5
12/5/2018	Correspond with F. Levenson, S. Becker, and E. Bonham regarding discovery strategy.	0.4
12/11/2018	Draft and send correspondence to opposing counsel regarding discovery progress.	1.1
1/2/2019	Correspondence with co-counsel regarding document processing and review.	1.0
1/25/2019	Review documents produced by Defendant, and draft summary for co-counsel.	4.8
1/29/2019	Analysis of documents produced by defendants, and discussion with co-counsel.	1.5
2/1/2019	Review draft written discovery responses, and make note of potential edits.	2.1
2/4/2019	Call with ACLU of Ohio team regarding written discovery responses.	0.4
2/27/2019	Attention to settlement strategy, including review of pleadings and discussions with F. Levenson and E. Bonham.	1.3
3/21/2019	Team conference call discussing discovery strategy.	1.0
4/26/2019	Review draft discovery responses, and revise.	1.2
6/24/2019	Correspondence and discussion regarding strategy for supplemental authority.	0.4
7/3/2019	Review and analyze opposing expert's opinion, and correspond with co-counsel.	3.8
7/23/2019	Correspond with team regarding strategy for expert witness.	1.1
7/25/2019	Review draft expert report.	1.1
7/26/2019	Discussion with E. Bonham regarding case strategy, and legal research regarding deference issues.	1.8
8/8/2019	Discussion with co-counsel regarding strategy for discovery responses.	0.7
8/8/2019	Review discovery requests.	0.5
8/12/2019	Review discovery requests, make notes regarding potential objections, and discuss with co-counsel.	1.7

8/16/2019	Review draft deposition prep outline and send comments to E. Bonham.	0.9
8/18/2019	Review background materials, including complaint, discovery responses, and expert reports, in advance of witness prep session.	3.5
8/18/2019	Deposition prep for S. Ray.	3.5
8/19/2019	Attend and assist in defending deposition of S. Ray.	4.0
9/12/2019	Review and analyze order denying motion to dismiss.	2.4
9/27/2019	Read defendant's Answer.	1.2
10/14/2019	Correspondence with co-counsel regarding procedures for designating and sealing confidential material, and related strategy matters.	2.8
11/4/2019	Discussions with co-counsel regarding briefing strategy for summary judgment.	1.1
1/8/2020	Review and revise draft summary judgment motion.	3.8
1/8/2020	Call with E. Bonham discussing strategy for summary judgment.	0.7

**Total Time** **82.1**

**Hourly Rate** x **\$ 375.00**

**Lodestar Fees** **\$ 30,787.50**